



DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
WASHINGTON, D.C. 20224

MAY 06 2004

MEMORANDUM FOR LAURETTA BROWN
DIRECTOR, ATLANTA CONTACT CENTER SUPPORT

FROM:

Maya A. Bernstein
Privacy Advocate

SUBJECT:

Aspect Automated Call Distributor Privacy Impact
Assessment

The Office of the Privacy Advocate has reviewed the Privacy Impact Assessment (PIA) for the Aspect Automated Call Distributor (ACD). Based on the information you provided, our office does not have any privacy concerns that would preclude ACD from operating. A revised PIA is required when considering any major modifications to the ACD, or at the scheduled recertification of this system/application.

We will forward a copy of the PIA to the Director, Modernization and System Security, to be included in the Certification and Accreditation package for formal acceptance. That office may request information concerning the statements contained in the PIA to ascertain compliance with applicable security requirements.

Note that the Electronic Government Act of 2002 requires that the IRS make this PIA available to the public. If there is any portion of this PIA that you believe would cause harm to the IRS or any party if disclosed to the public, please mark those portions and return to our office within 10 days.

If you have any questions or would like to discuss this PIA, please contact me at 202-927-5170. Our staff analyst is Priscilla Hopkins at 202-927-9875.

Attachment

cc: Director of Regulatory Compliance

Date: (signed November 11, 2003)

MEMORANDUM FOR MAYA A. BERNSTEIN
PRIVACY ADVOCATE CL:PA

FROM: Laretta Brown, Director Contact Center Support
Division OS:CIO:I:EO:CC

SUBJECT: Request for Privacy Impact Assessment (PIA) –
Aspect Automatic Call Distributor (ACD) Version 8.4

Purpose of the System: The primary purpose of the Automatic Call Distributors (ACDs) located in Internal Revenue Service (IRS) call sites is to direct calls from taxpayers to IRS Customer Service Representatives (CSRs) for assistance. The CSRs answer questions on technical issues of varying complexity; provide assistance in procedural matters; resolve account inquiries; secure payment of delinquent taxes; provide information on the status of refunds; and complete orders for tax forms and publications. Although the ACDs are used by taxpayers and CSRs for voice communications, no taxpayer data is stored on the system.

The ACDs were purchased from Aspect Communications and currently operate on Aspect software Version 7.2.2. There are 44 ACDs operational in the IRS, four of which are in a lab environment. The ACDs are going through a complete Certification and Accreditation and upon receipt of Security approval we plan to upgrade the Aspect software from Version 7.2.2 to Version 8.4. The original PIA for the ACD was covered under the Customer Communications FY 2001 Privacy Impact Assessment (PIA).

We are now requesting approval of the attached PIA for the Aspect Automatic Call Distributor Version 8.4.

Name of Request Contact:

Name: : Bob Buren
Organization Name & Symbols: : Contact Center Management and
Planning Section OS:CIO:I:EO:CC:M

Mailing Address: IRS
5000 Ellin Road
Lanham, MD 20706

Phone Number (with area code) 202-283-4627

Name of Business System Owner:

Name: Laretta Brown

Organization Name & Symbols: Contact Center Support Division
M:O:EO:CC

Mailing Address: ATSC

Phone Number (with area code): 678-530-5958

Requested Operational Date: 11/15/03

Category: (Reason PIA is required--enter "y" or "n" and applicable dates)

New System?: _____

Recertification? (if no change, enter date of last certification)

Yes

Modification of existing system?: Yes

Is this a National Standard Application (NSA)?: No

Is this a Modernization Project or System? No

If yes, the current milestone?: n/a

System of Record Number(s) (SORN) #:

The Disclosure Office confirms that the only Privacy Act records are for the audit logs, which are covered by Treasury/IRS 34.037, the IRS Audit Trail and Security Records System. Treas/IRS 00.001 would cover any miscellaneous correspondence that is subject to the PA. (For 00.001 definitions, correspondence includes telephone calls

Attachment: Aspect Automatic Call Distributor (ACD) Version 8.4 Privacy Impact Assessment (PIA)

Section 1.0. Data in the System

ACD MIS

1. Generally describe the information to be used in the system in each of the following categories:

The Aspect 8.4 collects:

- **Call Detail Data** - Stores detailed information for all calls except those in the current day. See page 1-19 of the Aspect 8.4 Database Tables and Fields Reference Guide 11/1/02.
- **Event Detail Data** - Stores detailed information on non-call related events. See page 1-71 of the Aspect 8.4 Database Tables and Fields Reference Guide 11/1/02.
- **Application Data** - Stores information that enhances call routing and reporting. See page 1-9 of the Aspect 8.4 Database Tables and Fields Reference Guide 11/1/02.
- **Dialed Number Identification Service (DNIS) Data** - Based on digits collected from the service provider the call is directed to the IRS Customer Service Representative with the proper skills to answer the taxpayer's question(s). See page 1-70 and page 1-100 of the Aspect 8.4 Database Tables and Fields Reference Guide 11/1/02.
- **Agent Activity Data** - Generally, identifies the agent by extension number and whether they are signed on, signed off, idle, length of time in that state with reason. See page 1-5 and 1-6 of the Aspect 8.4 Database Tables and Fields Reference Guide 11/1/02.
- **Configuration Data** - This consists of hardware and software. The hardware configuration consists of the ACD and its associated cards, telephone instruments and workstations. The software controls the flow of the calls and directs the call to the proper CSR with the necessary skills. The CSR is part of a group that is trained in specific applications to answer taxpayer questions. An application on the ACD could be Child Care, IRA, Refund, etc.
- **Employee:**
Phone extensions from which calls are made or returned, which can be traced to a particular employee, or the capture of user names or ID's. Data concerning the processing of calls handled by a particular employee is not used by IRS for evaluation purposes. This data can be associated with a particular user via a tracking number or time/date stamp on the call record which can be associated with a specific employee or phone extension. Tables which capture employee user names, user IDs, or phone extensions are:

Table Name	Source
	Aspect 8.4 Database Tables and Fields Reference Guide 11/1/02
Calldetail – Stores detailed information for all calls except those in the current day.	Page 1-19
Trkdetail – Stores detailed information about all transferred calls except those for the current day.	Page 1-46
Eventdtl – Stores detailed information on non-call related events.	Page 1-71
Users – Identifies individuals who have extension numbers and assigns every user, including agents, team supervisors, system managers, technicians, and administrative users, an agent group, team, and class of service number.	Page 1-135

- **Other:**

Other data tables collected for the MIS system but which are not related to either Taxpayer or Employee individuals are:

Table Name	Source
	Aspect 8.4 Database Tables and Fields Reference Guide 11/1/02
Agentgrp – For each agent group, identifies the method of call queuing and the call waiting thresholds.	Page 1-6
Applic – Stores information that enhances call routing and reporting.	Page 1-9
DNIS – Determines the Call Control Table that routes the call and the call type announcement that the CSR hears and sees on their telephone instrument display.	Page 1-70
System Audit Logs	Operating System
System Monitor Logs	Operating System
System Backup Tapes	Operating System Backup Manager
Security and Firewall Monitor Logs	Security System

Additionally data from system audit and monitoring files will be used to measure system performance including availability, reliability, and resource usage.

2. What are the sources of the information in the system?

The sources for information for the ACD – Aspect 8.4, system backup files, operating system audit logs, operating system monitor logs, and security monitor/firewall logs. Each of these sources is described below

a. What IRS files and databases are used?

IRS files and databases used for MIS are those established on the source systems where MIS data is collected. Other IRS files and databases include backup tapes, system audit logs, and system monitoring logs. The IRS files and databases expected to be used for MIS are:

Table Name	Source
	Aspect 8.4 Database Tables and Fields Reference Guide 11/1/02
Agentgrp	Page 1-6
Applic	Page 1-9
Calldetail	Page 1-19
Trkdetail	Page 1-46
Aac_event – Identifies the agent by extension number and the duration of the Agent Idle with reason state or Agent Sign-Off event.	Page 1-5
DNIS	Page 1-70
Eventdtl	Page 1-71
Users	Page 1-135
System Audit Logs	Operating System
System Monitor Logs	Operating System
System Backup Tapes	Operating System Backup Manager
Security and Firewall Monitor Logs	Security System

b. What Federal Agencies are providing data for use in the system?

There are no current plans to acquire MIS data from other Federal agencies.

c. What State and Local Agencies are providing data for use in the system?

There are no current plans to acquire MIS data from state or local agencies

d. From what other third party sources will data be collected?

Dialed Number Identification Service (DNIS) data is raw data collected directly from the American Telephone and Telegraph (AT&T) and Sprint switches. DNIS is used by the Aspect ACD to direct the caller to the group of CSRs that can answer their question. The Taxpayer uses a toll-free number (e.g. 1-800-829-1040 for income tax questions or 1-800-829-1954 for refund status, etc.) and based on the last four digits of that number it is routed to the CSRs that have the knowledge to answer the call.

e. What information will be collected from the taxpayer/employee?

No MIS data is collected from the taxpayer.

Employee data which will be collected for use by MIS includes the employee name, user name, status of CSR to answer call, and other identifying data which will be contained in the Table Users (Pg 1-135) Aspect 8.4 database reference guide. This data is expected to be entered by the employee on a form when requesting an account in order to work as a technical staff on Aspect 8.4 systems. The data will then be entered into the Aspect 8.4 system in Table Users by a system administrator when setting up the user account.

3. a. How will data collected from sources other than IRS records?

No data is collected from sources other than IRS records. No tax information is stored on the ACD, just call processing information. Call processing can consist of many variables, for example, calls in que, calls waiting time, calls answered, calls abandoned, length of call, etc. CSRs access tax information on the IRS Integrated Data Retrieval System (IDRS) which is not connected to the ACD.

b. How will data be checked for completeness?

Each daily set of records contains a set of ranges in key fields. All elements of the range must be present in the record set to make the record complete. A check of the required set of ranges in the key fields will assure data completeness for each daily MIS record set.

c. Is the data current? How do you know?

There are two types of data on the ACD, one is real time and the other historical. The real time is used by the System Administrator(s) and group managers to monitor call processing and print reports. The real time data is refreshed every nine seconds.

4. Are the data elements described in detail and documented? If yes, what is the name of the document?

All ACD data elements are described and documented in the Aspect Database Tables and Fields Reference Guide v8.4 dated November 1, 2002.

ACD Call Management

- Employee related data in the Automatic Call Distributor which may have privacy implications can come from the capture of phone extensions from which calls are made or returned, which can be traced to a particular employee or the capture of user names or IDs. Other employee related data concerns the processing of calls handled by a particular employee since this can be used to infer employee performance. This data can be associated with a particular user via a tracking number or time/date stamp on the call record which can be associated with a specific employee or phone extension. Tables which potentially capture employee user names, user IDs, or phone extensions are:

Table Name	Source
	Aspect 8.4 Database Tables and Fields Reference Guide 11/1/02
Calldetail	Page 1-19
Trkdetail	Page 1-46
Eventdtl	Page 1-71
Users	Page 1-135

- Other:**

All other data used by the ACD system, including MIS and Call Management, is described in the MIS section of this document.

2. What are the sources of the information in the system?

Sources of information for the call management system is the Aspect 8.4. An alternative source of information would be backup tapes of the Aspect 8.4.

a. What IRS files and databases are used?

The primary IRS database which will be used by Call Management is Aspect 8.4 tables.

b. What Federal Agencies are providing data for use in the system?

There are no current plans to acquire Call Management data from other Federal agencies for call management systems.

c. What State and Local Agencies are providing data for use in the system?

There are no current plans to acquire Call Management data from state or local agencies.

d. From what other third party sources will data be collected?

Call Management will collect DNIS data from AT&T and Sprint for use by Aspect 8.4. This data will be used later by the MIS function described in a previous section of this document.

e. What information will be collected from the taxpayer/employee?

No call management data is expected to be collected from the taxpayer.

Employee data which will be collected for use by Call Management includes the employee name, user name, status of user name (active/inactive), and other identifying data which will be contained in the Table Users collected from Aspect 8.4. This data is expected to be entered by the employee on a 5081 form when requesting an account in order to work as a technical staff on Aspect systems. The data will then be entered into the Aspect 8.4 system in Table Users by a system administrator when setting up the user account.

3. a. How will data collected from sources other than IRS records accuracy?

Data for Call Management collected from AT&T and Sprint is collected in real time. This data is collected directly from AT&T and Sprint phone switches is raw source data. The DNIS data collected from AT&T and Sprint is considered reliable as a matter of accepted practice so that separate checks for accuracy are not required.

b. How will data be checked for completeness?

DNIS data is raw data collected directly from AT&T and Sprint switches for call management and is considered complete upon delivery as a matter of accepted practice.

c. Is the data current? How do you know?

Data from AT&T and Sprint is current since it is received in real time from the AT&T and Sprint switches.

4. Are the data elements described in detail and documented? If yes, what is the name of the document?

All Call Management data elements are described in the Aspect Database Tables and Fields Reference Guide, v8.4, dated November 1, 2002.

Section 2.0. Access to the Data

ACD MIS

1. Who will have access to the data in the system (Users, Managers, System Administrators, Developers, Other)?

Managers – Manager can view real time status of their group and number of calls in queue. It is not used for evaluation purposes.

System Administrators – IRS SAs typically have root or supervisor privileges as part of their job duties in maintaining and configuring systems. Consequently the SAs will have access to all MIS data.

Vendor Maintenance Staff – Vendor maintenance staff from Aspect are expected to have supervisor privileges on the Aspect 8.4 systems. Consequently they will have access to MIS source data stored on the Aspect 8.4 machines.

2. How is access to the data by a user determined? Are criteria, procedures, controls, and responsibilities regarding access documented?

Access to the data is determined by the IRS Business and the IRS Aspect System Administrator (SA). The ACD system does not store any taxpayer data and the MIS data is primarily call processing statistics. For example, number of calls answered, number of calls in queue, average speed of answer, number of calls abandoned (taxpayers that got access to our system but terminated the call), etc. A user's access to the data is terminated by the IRS Aspect SA when it is no longer required.

Criteria, procedures, controls and responsibilities regarding access will be documented in the ACD Security Features User's Guide and Trusted Facility Manual. These manuals are included or referenced in the Aspect 8.4 Security Certification and Accreditation software tool.

Vendors that maintain the ACD are escorted and monitored at all times.

The MIS system requires users to identify themselves and provide proof of their identity by USERIDs and passwords. USERIDs are unique to each user. Presently, only IRS employees answer the calls. In the event they need to access the IRS Integrated Data Retrieval System (IDRS) it is done through a separate workstation in their cubicle. There is no data transferred from the IDRS workstation to the ACD.

- 3. Will users have access to all data on the system or will the user's access be restricted? Explain.**

IRS Aspect System Administrators will have read, write, update, erase, and copy privileges in the Aspect 8.4 ACD as is necessary for their job duties.

Managers will have read access to the real time MIS data. They will have read access to data contained on MIS reports. These reports will be accessed and printed from the MIS system.

Vendor maintenance staff from Aspect will have read, write, update, copy, and erase privileges for source MIS data stored on Aspect 8.4 machines only.

- 4. What controls are in place to prevent the misuse (e.g. browsing) of data by those having access?**

IRS Aspect System Administrators have access to all the MIS data. The IRS Aspect SA can view all the CSRs activity on the system.

IRS call site managers only have access to the CSRs that are reporting to their group. They cannot view another manager's group unless given specific permission by that manager.

CSRs do not have direct access to the real time or historical information. However, they can determine what type of call they are receiving on their telephone, e.g., Child Credit. Contractors have access to system performance data, e.g., number of calls answered, calls in queue, etc. IRS System Administrators have access to CSR data but it is not used for evaluation purposes.

- 5. a. Do other systems share data or have access to data in this system? If yes, explain.**

To monitor the enterprise, the Contact Center Support Division operates a Joint Operations Center (JOC) in Atlanta GA. Among other duties, the JOC creates MIS reports on an enterprise level using the Aspect 8.4 Call Management data. This data is downloaded from the ACDs to a server in Atlanta for creation of the enterprise reports. This system is known as ETD, Electronic Telephone Database.

There is also scheduling hardware/software known as the TeleCenter Workload Management System that receives data from the ACDs. This system is used to plan and schedule the workload at the ACD sites.

There is no taxpayer data on the ACD that can be retrieved by an IRS employee, vendor or other system.

- b. Who will be responsible for protecting the privacy rights of the employees affected by the interface?**

The business owner (Director, Contact Center Support Division) will be responsible for protecting privacy rights of the employees as they are affected by the MIS reports and the data in the MIS databases and tables.

- 6. a. Will other agencies share data or have access to data in this system (International, Federal, State, Local, Other)?**

No other agencies share MIS data or have access to the MIS data.

- b. How will the data be used by the (other) agency?**

No other agencies share MIS data or have access to the MIS data. However, data can be requested from GAO or TIGTA as required by statute.

- c. Who is responsible for assuring proper use of the data?**

No other agencies share MIS data or have access to the MIS data.

- d. How will the system ensure that agencies only get the information they are entitled to under IRC 6103?**

No other agencies share MIS data or have access to the MIS data. The ACD MIS is not used to evaluate CSRs.

ACD Call Management

- 1. Who will have access to the data in the system (Users, Managers, System Administrators, Developers, Other)?**

System Administrators – SAs typically have root or supervisor privileges as part of their job duties in maintaining and configuring systems. Consequently the SAs will have access to all Call Management data.

IRS call site managers only have access to the CSRs that are reporting to their group. They cannot view another manager's group unless given specific permission by that manager.

Vendor Maintenance Staff – Vendor maintenance staff from Aspect are expected to have supervisor privileges on the Aspect 8.4 systems. Consequently they will have access to Call Management source data stored on the Aspect 8.4 machines.

2. How is access to the data by a user determined? Are criteria, procedures, controls, and responsibilities regarding access documented?

IRS Aspect System Administrators have access to all the MIS data. The IRS Aspect SA can view all the CSRs activity on the system.

IRS call site managers only have access to the CSRs that are reporting to their group. They cannot view another managers group unless given specific permission by that manager.

CSRs do not have direct access to the real time or historical information.

Access to the data is determined by the IRS Business and the IRS Aspect System Administrator (SA). The ACD system does not store any taxpayer data and the MIS data is primarily call processing statistics. For example, number of calls answered, number of calls in queue, average speed of answer, number of calls abandoned (taxpayers that got access to our system but terminated the call since they did not want to wait for a CSR), etc.

A user's access to the data is terminated by the IRS Aspect SA. For example, when a CSR leaves IRS the group manager informs the System Administrator to delete their login

Criteria, procedures, controls and responsibilities regarding access will be documented in the ACD Security Features User's Guide and Trusted Facility Manual.

All Vendors are escorted and monitored at all times.

The MIS system requires users to identify themselves and provide proof of their identity by USERIDs and passwords. USERIDs are unique to each user.

3. Will users have access to all data on the system or will the user's access be restricted? Explain.

System administrators will have read, write, update, erase, and copy privileges as is necessary for their job duties.

IRS call site managers only have access to the CSRs that are reporting to their group. They cannot view another managers group unless given specific permission by that manager.

Vendor maintenance staff from Aspect will have read, write, update, copy, and erase privileges for source Call Management data stored on Aspect 8.4 machines only.

4. **What controls are in place to prevent the misuse (e.g. browsing) of data by those having access?**

IRS Aspect System Administrators have access to all the MIS data. The IRS Aspect SA can view all the CSRs activity on the system.

IRS call site managers only have access to the CSRs that are reporting to their group. They cannot view another managers group unless given specific permission by that manager.

CSRs do not have direct access to the real time or historical information.

5. **a. Do other systems share data or have access to data in this system? If yes, explain.**

To monitor the enterprise, the Contact Center Support Division operates a Joint Operations Center (JOC) in Atlanta GA. Among other duties, the JOC creates MIS reports on an enterprise level using the Aspect 8.4 Call Management data. This data is downloaded from the ACDs on to a server in Atlanta for creation of the enterprise reports. This system is known as ETD, Electronic Telephone Database.

There is also scheduling hardware/software known as the TeleCenter Workload Management System that receives data from the ACDs. This system is used to plan and schedule the workload at the ACD sites.

- b. **Who will be responsible for protecting the privacy rights of the employees affected by the interface?**

The user is protected by the audit trail showing who is accessing the system. These logs are reviewed by IRS employees at the site to ensure proper access of the data. Ultimately, the IRS site manager is responsible for protecting the privacy rights of the employees.

6. **a. Will other agencies share data or have access to data in this system (International, Federal, State, Local, Other)?**

No other agencies share Call Management data or have access to the Call Management data.

- b. **How will the data be used by the (other) agency?**

No other agencies share Call Management data or have access to the Call Management data.

c. Who is responsible for assuring proper use of the data?

No other agencies share Call Management data or have access to the Call Management data.

d. How will the system ensure that agencies only get the information they are entitled to under IRC 6103?

No other agencies share Call Management data or have access to the Call Management data.

Section 3.0. Attributes of the Data

ACD MIS

- 1. Is the use of the data both relevant and necessary to the purpose for which the system is being designed?**

The use of the data is relevant and necessary to the monitoring and control of the Aspect ACD 8.4. A wide variety of taxpayer calls are received by the ACD and CSRs are trained in a wide range of specialties and are typically placed in groups. In the event that a group at one site is receiving too many calls the taxpayer can be diverted to another group in the enterprise with the same skills. Also the MIS data collected is relevant to planning functions since it contains many measures of employee use of the system.

- 2. a. Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected?**

No new data will be derived or created about an individual. The ACD data is stored on the system and off the system on magnetic media for backup purposes and enterprise reporting. No data or report is used for CSR evaluation. Custom reports are created but they are statistical in nature about system performance, not individual performance. The system does not derive new data or create previously unavailable data about an individual through aggregation from the information collected.

- b. Will the new data be placed in the individual's record (employee)?**

No new data created by the ACD MIS system will be placed in any employee record. ACD data is not used for CSR evaluation purposes.

- c. Can the system make determinations about employees that would not be possible without the new data?**

No determinations about employees can be made that would not be possible without the data.

- d. How will the new data be verified for relevance and accuracy?**

Only data mandated by the Aspect 8.4 system will be collected, hence assuring relevancy since technicians cannot maintain the Aspect 8.4 systems without establishing accounts containing this information. The Aspect 8.4 system performs a limited number of accuracy checks on the data entered. Otherwise data accuracy will be the responsibility of the System Administrator establishing the accounts on the Aspect 8.4 system.

3. a. If data is being consolidated, what controls are in place to protect the data from unauthorized access or use?

No employee specific information is being consolidated in the ACD MIS.

- b. If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access? Explain

No processes are being consolidated in the ACD MIS

4. How will the data be retrieved? Can it be retrieved by personal identifier? If yes, explain.

Source MIS data will be retrieved only by the MIS system using software applications and/or scripts. Each application and/or script will have an application ID assigned by the operating system which will be logged by the normal auditing process, so identification of which software applications are retrieving source MIS data will be available. MIS users will be able to retrieve data only through the MIS reporting system. Use of this system will require user IDs to log on and make report requests, which will also be audited by the operating system.

5. What are the potential effects on the due process rights of taxpayers and employees of:

- a. Consolidation and linkage of files and systems;

There is no consolidation or linkage of files that affect the due process rights of taxpayers and employees.

- b. Derivation of data;

Statistical measures of system use and effectiveness are derived from the MIS data. However these statistics do not identify any individual employee and taxpayer information is not stored. Consequently there is no impact on the due process rights of taxpayers and employees from the derivation of these statistical measures.

- c. Accelerated information processing and decision making;

No pitfalls due to accelerated information processing or decision by the MIS system is anticipated. However this acceleration due to the faster availability of measures of use and effectiveness could result in better IRS employee usage and improved customer service as a result of improved management insight into the operation.

d. Use of new technologies;

The primary impact of new technologies for the ACD are positive ones. The automation of statistical measure derivation by the MIS means IRS managers will have faster access to more accurate measures of system performance and usage. This will allow for better decision-making regarding the use of resources.

e. How are the effects to be mitigated?

There are no negative effects to be mitigated.

ACD Call Management

1. Is the use of the data both relevant and necessary to the purpose for which the system is being designed?

The use of the data is relevant and necessary to the proper routing and management of customer service telephone calls. There will be additional data elements with the upgrade and they will relate to system performance. No data elements will be used for CSR evaluation.

2. a. Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected?

No new data will be derived or created about an individual. The ACD data is stored on the system and off the system on magnetic media for backup purposes and enterprise reporting. No data or report is used for CSR evaluation. Custom reports are created but they are statistical in nature about system performance, not individual performance. The system does not derive new data or create previously unavailable data about an individual through aggregation from the information collected.

b. Will the new data be placed in the individual's record (taxpayer or employee)?

No new data will be placed in an employee record since the Call Management system will not derive, create, or aggregate from the information collected new data which can be directly traced to a specific employee.

c. Can the system make determinations about employees that would not be possible without the new data?

No determinations about employees can be made which would not be possible without the data.

d. How will the new data be verified for relevance and accuracy?

Only data mandated by the Aspect 8.4 system will be collected, hence assuring relevancy since technicians cannot maintain the Aspect 8.4 systems without establishing accounts containing this information. The Aspect 8.4 system performs a limited number of accuracy checks on the data entered. Otherwise data accuracy will be the responsibility of the System Administrator establishing the accounts on the Aspect 8.4 system.

3. a. If data is being consolidated, what controls are in place to protect the data from unauthorized access or use?

No employee specific information is being consolidated in the Aspect ACD.

b. If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access? Explain

No processes are being consolidated in the Aspect 8.4 ACD.

4. How will the data be retrieved? Can it be retrieved by personal identifier? If yes, explain.

System Administrators will be able to retrieve data only through the MIS reporting system. Use of this system will require user IDs to log on and make report requests, which will also be audited by the operating system. The ACD allows retrieval by Personal identifiers, for example a CSR login, their name or nick name.

5. What are the potential effects on the due process rights of employees of:

a. Consolidation and linkage of files and systems;

There is no consolidation or linkage of files or systems planned for the Aspect ACD.

b. Derivation of data;

There is no derivation of data planned for the Aspect ACD.

c. Accelerated information processing and decision making;

No pitfalls due to accelerated information processing or decision by the Call Management system are anticipated. However this acceleration due to the faster availability of measures of use and effectiveness could result in better IRS employee usage and improved customer service as a result of improved management insight into the operation.

d. Use of new technologies;

The primary impact of new technologies for Aspect ACD are positive. The automation of statistical measure derivation by the MIS means IRS managers will have faster access to more accurate measures of system performance and usage. This will allow for better decision-making regarding the use of resources in the program.

e. How are the effects to be mitigated?

There are no negative effects to be mitigated.

Section 4. Maintenance of Administrative Controls

ACD MIS

- 1. a. Explain how the system and its use will ensure equitable treatment of taxpayers and employees.**

The ACD system is designed to produce a standard set of reports containing statistical measures of the health, use, and effectiveness of the ACD system. There are no measures of individual employee effectiveness in any of these reports. Consequently by using the standard set of reports all employees are treated alike in terms of being in the same statistical population of IRS employee users. Taxpayer calls coming into the ACD are treated on a first come first served basis.

- b. If the system is operated in more than one site, how will consistent use of the system and data be maintained in all sites?**

All sites using the ACD will use the same set of standard MIS reports, which are produced from the same data set collected from the ACD system. The same MIS applications will collect the source MIS data and produce the standard reports.

- c. Explain any possibility of disparate treatment of individuals or groups.**

As long as the standard MIS reports are produced and used there is no possibility of disparate treatment of an individual.

- 2. a. what are the retention periods of data in this system?**

MIS data will be retained indefinitely in order to provide IRS management with a history of usage statistics. There is no personally identifiable information involved, only statistical data.

- b. What are the procedures for eliminating the data at the end of the retention period? Where are the procedures documented?**

On line MIS data is retained at the detail and summary level. The amount of time data is retained is based on the amount of phone calls a site receives. At a high volume site the detail may only last a few weeks and summary data for 400 days. When the system reaches its capacity it overwrites the old data.